RUBIN DECLARATION EXHIBITS CONTINUED

Rubin Exhibit 121

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES COPRORATION, and BLACK ENTERTAINMENT TELEVISION LLC,	)	Case No. 1:07-CV-2103-LLS (Related Case No. 1:07-cv-03582 (LLS))
Plaintiffs,	)	
v.	)	
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE INC.,	)	
Defendants.	)	

PLAINTIFFS' OBJECTIONS AND RESPONSES TO YOUTUBE'S THIRD SET OF INTERROGATORIES TO VIACOM INTERNATIONAL, INC. ET AL.

Plaintiffs Viacom International Inc., Comedy Partners, Country Music Television, Inc., Paramount Pictures Corporation, and Black Entertainment Television, LLC, by their attorneys Jenner & Block LLP and Shearman & Sterling LLP, hereby object to and respond to YouTube's Third Set of Interrogatories to Viacom International, Inc. (Defendants' Third Set of Interrogatories) as follows:

GENERAL OBJECTIONS

Plaintiffs make the following objections to specific Interrogatories by, among other things, incorporating by reference the following general objections ("General Objections"):

1. Plaintiffs object to the Third Set of Interrogatories in their entirety as exceeding the scope permissible under Local Rule 33.3(b), which states that interrogatories other than those seeking names of witnesses with relevant knowledge or information only if ordered by the court or if interrogatories are "a more practical method of obtaining the information sought than a request for production or a deposition." Defendants' interrogatory requests are unduly burdensome and duplicative of their document requests.

2. Plaintiffs object to the Third Set of Interrogatories in their entirety as exceeding, with subparts, the limit of twenty-five Interrogatories under the Court's Scheduling Order entered on August 9, 2007. Plaintiffs have already identified over 60,000 video clips that infringe its copyrights. Interrogatories 14, 15, 16, 17, 18, 19, 20, and 21 purport to request specific information about each of those thousands of infringing clips on a clip-by-clip basis; Interrogatory 25 seeks detailed information about each of Defendants' 213 Requests for Admission. Defendants' interrogatories thus impermissibly exceed the twenty-five interrogatory limit.

3. Plaintiffs object to Defendants' definition of "Viacom," which includes entities listed in Paragraph 3 of the Definitions. Paragraph 3 makes up a voluminous, globe-spanning listing of Plaintiffs' partners, affiliates, and subsidiaries. Defendants' inclusion of these entities is vexatious and improper. Plaintiffs further object to Defendants' definition of "Viacom" to the extent that it includes Plaintiffs' outside counsel, because searching for responsive information in the possession of Plaintiffs' outside counsel would be unduly burdensome.

Plaintiffs further object to Defendants' inclusion of Viacom's "agents," "representatives," "any other person acting or purporting to act on [Viacom's] behalf," or

"any other person otherwise subject to its control" in their definition of Viacom because those terms and/or phrases are overbroad and vague.

4. Plaintiffs object to Defendants' Third Set of Interrogatories to the extent that they seek to impose on Plaintiffs obligations or requirements beyond those imposed by the Federal Rules of Civil Procedure or the Local Rules of the Southern District of New York.

5. Plaintiffs object to Defendants' Third Set of Interrogatories to the extent that they seek information or request documents that are known to Defendants, are a matter of public record, or otherwise publicly available.

6. In objecting to Defendants' Third Set of Interrogatories, Plaintiffs do not in any way waive or intend to waive but, rather, intend to preserve and are preserving:

a. all objections as to competency, relevancy, materiality, privilege and admissibility of evidence for any purpose of any information or document, or the subject matter thereof, in the trial of this or any other action or subsequent proceedings;

b. the right to object to the use of any information or document, or the subject matter thereof, in the trial of this or any other action or subsequent proceedings;

c. the right to elicit appropriate evidence, beyond the responses themselves, regarding the subjects referred to in or in response to any request;

d. the right to preserve the confidential or proprietary nature of any information or document, or the subject matter thereof, by mutual agreement or otherwise, as a condition of production; *and*

e. the right at any time to correct, supplement, or clarify any of the objections.

7. Plaintiffs' objections to Defendants' Third Set of Interrogatories shall not constitute an admission of any statement or conclusion implied in any of Defendants' Interrogatories.

RESPONSES AND OBJECTIONS TO SPECIFIC INTERROGATORIES

Subject to and without waiving any of the foregoing General Objections, which apply to each Interrogatory as if set forth fully below, Plaintiffs make the following specific responses and objections:

INTERROGATORY NO. 11:

For each instance in which You contend that Viacom requested access to use a YouTube Copyright Protection Service, but was denied such access, identify the Viacom entity that requested access, the date of the request, the name(s) of the specific YouTube Copyright Protection Service for which access was requested, and the production number (Bates number) of each document reflecting or evidencing the request and denial.

Response and Objections to Interrogatory No. 11:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory exceeds the scope permissible under Local Rule 33.3(b) because it is not "a more practical method of obtaining the information sought than a request for production or a deposition." Plaintiffs also object that this Interrogatory is overbroad, oppressive, harassing and unduly burdensome to the extent it seeks highly detailed information. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly

subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory because it seeks information produced in discovery. Such information is already equally and fully accessible to Defendants — indeed, Defendants should know when they denied Viacom access to YouTube Copyright Protection Services without having to ask Viacom — and it is unduly burdensome to require Plaintiffs to review documents and information to identify particular information for Defendants.

Subject to and without waiver of these general and specific objections, Plaintiffs provide the following examples of instances where Defendants denied Viacom access to YouTube Copyright Protection Services. Although these examples are not necessarily an exhaustive list of every instance in which Viacom requested but was denied access to a YouTube Copyright Protection Service, they illustrate the point.

On February 2, 2007, Viacom General Counsel Michael D. Fricklas sent a letter to David Drummond and Kent Walker requesting that Defendants take a number of measures to prevent rampant copyright infringement on the site and specifically stated that Viacom was "interested in working with [Defendants]" as Defendants began to use Audible Magic. (VIA01475465–VIA01475476.) On February 16, 2007, Mr. Walker refused on behalf of Defendants to allow the use of Audible Magic to protect Viacom's copyrights (VIA01974134–VIA01974136).

In addition, Dean Garfield testified that YouTube generally refused to provide its copyright protection services to companies without partnership agreements: "[I]t became clear that Google/YouTube was willing to filter for those who had a licensing

relationship with Google/YouTube and not for those who did not." (D. Garfield Tr. Nov. 2, 2009 at 55:10-13.)

INTERROGATORY NO. 12:

Describe each policy adopted by a Viacom UGC Site addressing termination of the accounts of users who are "repeat infringers" (as that phrase is used in 17 U.S.C. § 512(i)), identifying in the description the Viacom UGC Site that adopted the policy, the dates during which the policy was in effect, and the number of users terminated pursuant to the policy.

Response and Objections to Interrogatory No. 12:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory exceeds the scope permissible under Local Rule 33.3(b) because it is not "a more practical method of obtaining the information sought than a request for production or a deposition." Plaintiffs also object that this Interrogatory is overbroad, oppressive, harassing and unduly burdensome to the extent it seeks highly detailed information. In addition, Plaintiffs object that this Interrogatory because it seeks information contained in documents produced in discovery. Such information is already equally and fully accessible to Defendants, and it is unduly burdensome to require Plaintiffs to review the documents to identify particular information for Defendants.

Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: Plaintiffs have produced numerous Terms of Use documents in discovery. *See* Attachment A, Documents Responsive to Interrogatory 12. Those documents contain information responsive to this Interrogatory.

INTERROGATORY NO. 13:

If You still contend, as alleged, that "YouTube prevents copyright owners from finding on the YouTube site all of the infringing works from which YouTube profits," identify each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 13:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action,

numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 14:

If You assert a claim of copyright infringement for any Accused Clip, that you contend does not arise "by reason of the storage at the direction of a user" (as that phrase is used in 17 U.S.C. § 512(c)), identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 14:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly

subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 15:

For each Accused Clip, if You contend that, before YouTube received a DMCA Takedown Notice for the Accused Clip, YouTube had "actual knowledge" (as that phrase is used in 17 U.S.C. § 512(c)(1)) that the Accused Clip infringed Your copyright or that YouTube was "aware of facts or circumstances from which infringing activity [was] apparent" as (as that phrase is used in 17 U.S.C. § 512(c)(1)), identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 15:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention,

and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 16:

For each Accused Clip, if You contend that YouTube failed to act "expeditiously to remove, or disable access to," (as that phrase is used in 17 U.S.C. § 512(c)(1)) the Accused Clip after receiving actual knowledge or becoming aware of facts or circumstances from which it was apparent that the Accused Clip infringed a Work In Suit, or after receiving a DMCA Takedown Notice relating to the Accused Clip, identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 16:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly

subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 17:

For each Accused Clip, if You contend that YouTube received a "financial benefit directly attributable to" (as that phrase is used in 17 U.S.C. § 512(c)(1)(B)) the Accused Clip, identify separately for each such Accused Clip the amount of the financial benefit, and each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 17:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory

that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 18:

For each Accused Clip, if You contend that YouTube had "the right and ability to control" (as that phrase is used in 17 U.S.C. § 512(c)(1)(B)) the allegedly

infringing activity with respect to that Accused Clip, identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 18:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver

of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 19:

For each Accused Clip, if You contend that the Accused Clip was uploaded to the YouTube website by a user who had no authorization, right, or license to do so, identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 19:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly

subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 20:

For each Accused Clip, if You still contend, as alleged, that YouTube "enable[d], induce[d], facilitate[d], and materially contribute[d] to each act of infringement by YouTube users" with respect to the Accused Clip, identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 20:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory

that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 21:

For each Accused Clip, if You still contend, as alleged, that YouTube's actions were "willful, intentional, and purposeful, in disregard of and indifferent to

[Your] rights" with respect to infringing activity associated with the Accused Clip, identify separately for each such Accused Clip each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 21:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' claims, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of the over 60,000 Accused Clips and thereby effectively seeks thousands of separate responses. Subject to and without waiver

of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support the quoted contention, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

INTERROGATORY NO. 22:

If you still contend, as alleged, that You have incurred actual damages directly caused by YouTube, identify the specific total amount of actual damages that You have incurred, describe in detail the legal theory upon which You would seek to recover these actual damages and each calculation You used to calculate these actual damages, and identify each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 22:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. Further, Plaintiffs object that the determination, specification, and quantification of actual damages are matters properly subject to expert analysis and discovery in this case. This Interrogatory is thus premature and inconsistent with the Scheduling Order governing this case in that it seeks information that is properly subject to disclosure only when expert reports are exchanged. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine.

Subject to and without waiver of the foregoing objections, Plaintiffs respond as follows: Plaintiffs have incurred significant actual damages due to Defendants' unauthorized infringement, including, without limitation, lost licensing revenues payable by Defendants and lost advertising, syndication, and other distribution revenues payable by third parties.

INTERROGATORY NO. 23:

Identify each Work In Suit uploaded in whole or in part to the YouTube website by Viacom or with Viacom's authorization and the date of each such authorized upload.

Response and Objections to Interrogatory No. 23:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, Plaintiffs object to Defendants' definition of "Works in Suit" as encompassing "all works ... as to which [Plaintiffs] have asserted claims of copyright infringement, at any time, in this action" and as encompassing portions of works as to which Plaintiffs have not asserted claims of copyright infringement in this action. This definition is facially overbroad and purports to cover content that is irrelevant to this copyright infringement action. Plaintiffs accordingly shall construe "Works in Suit" to encompass solely those clips listed on the Amended Production of Works in Suit produced to Defendants on October 15, 2009. Subject to that definition and subject to and without waiver of these general and specific objections, Plaintiffs respond as follows:

Plaintiffs uploaded none of the Works in Suit, and Plaintiffs authorized the upload of none of the Works in Suit.

INTERROGATORY NO. 24:

Identify each Work In Suit that Viacom has provided as a reference file to any third party for purposes of creating a digital fingerprint of the work to identify copies of the work on the Internet, the third parties to whom each reference file was provided, and the dates on which it was provided to those third parties.

Response and Objections to Interrogatory No. 24:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, Plaintiffs object that this Interrogatory is overbroad, oppressive, harassing and unduly burdensome to the extent it seeks highly detailed information. Plaintiffs also object that this Interrogatory is unduly burdensome insofar as it seeks information from time periods for which such records are not reasonably available to Plaintiffs. Plaintiffs further object to this interrogatory insofar as it calls for Plaintiffs to identify works supplied to Auditude and to YouTube as reference files for fingerprinting purposes. Defendants have already sought and obtained such records from Auditude in this litigation, and information concerning works Plaintiffs have supplied to YouTube is equally in Defendants' own possession. Plaintiffs further object to Defendants' definition of "Works in Suit" as encompassing "all works ... as to which [Plaintiffs] have asserted claims of copyright infringement, at any time, in this action" and as encompassing portions of works as to which Plaintiffs have not asserted claims of copyright

infringement in this action. This definition is facially overbroad and purports to cover content that is irrelevant to this copyright infringement action. Plaintiffs accordingly shall construe "Works in Suit" to encompass solely those clips listed on the Amended Production of Works in Suit produced to Defendants on October 15, 2009. Subject to that definition and subject to and without waiver of these general and specific objections, and based upon information available to Plaintiffs, Plaintiffs respond as follows:

Plaintiffs' current records of works Plaintiffs have provided to Audible Magic, Auditude, BayTSP, and YouTube for purposes of creating a digital fingerprint of the work to identify copies of the work on the Internet, and the dates on which they were provided to Audible Magic, Auditude, BayTSP, and YouTube, are reflected within the document attached hereto as Attachment B. The document attached hereto as Attachment C also lists the same information for additional works provided to Audible Magic and Auditude as DVDs and not reflected in Attachment B. Plaintiffs object that it would be unduly burdensome to require Plaintiffs to search these exhibits for the "Works in Suit," as such information is equally available to Defendants from the documents. The document attached hereto as Attachment D lists additional Works in Suit that Plaintiff Paramount supplied, as DVDs, to BayTSP on December 29, 2006 and to Audible Magic on May 8, 2007.

In addition to the works listed on the aforementioned exhibits, Plaintiffs have also directly generated fingerprints of their works and supplied those fingerprints to Vobile, YouTube, BayTSP, and Audible Magic for purposes of identifying copies of those works on the Internet. Plaintiffs have also provided Auditude and Audible Magic with MRSS feeds directing them to content available on Plaintiffs' websites so that Auditude and

Audible Magic can generate fingerprints thereof. Plaintiffs are not providing information concerning such in-house fingerprinting, or such MRSS feeds, in response to this Interrogatory, as the Interrogatory requests identification only of instances in which Plaintiffs have provided a "Work In Suit . . . as a reference file" and not identification of instances in which Plaintiffs have used alternative means for providing third-party vendors with fingerprints of Plaintiffs' works.

INTERROGATORY NO. 25:

If any of Your responses to a request for admission in this action is not an unqualified admission, identify the request for admission and each fact, each document, and each portion of a witness' testimony that supports this contention.

Response and Objections to Interrogatory No. 25:

Plaintiffs incorporate the foregoing General Objections, and object further that this Interrogatory is improper, overly broad, unduly burdensome, unreasonably cumulative, abusive, and exceeds the scope of permissible discovery under Local Civil Rule 33.3 and Federal Rules of Civil Procedure 26 and 33. In particular, an interrogatory that seeks identification of each fact supporting a contention is improper, abusive and goes beyond the scope permitted by the Rules. It is oppressive, harassing and unduly burdensome to ask Plaintiffs to parse the millions of documents and hundreds of depositions in this case to specify each fact, each document and each piece of testimony supporting Plaintiffs' responses to Defendants' requests for admission, especially where that information is equally available to Defendants. Further, Plaintiffs object that this Interrogatory is premature and inconsistent with the Scheduling Order governing this case to the extent that it seeks information that will be identified at a later stage of the

litigation and that is properly subject to disclosure only when expert reports are exchanged or when a pretrial order is entered. In addition, Plaintiffs object that this Interrogatory attempts to elicit trial or litigation strategy or information otherwise protected by the attorney work product doctrine. Finally, Plaintiffs object to this Interrogatory as complex and compound and as exceeding the limit of 25 Interrogatories under the Court's Scheduling Order in that it seeks separate and detailed information about each of Plaintiffs' responses to Defendants' 213 Requests for Admission and thereby effectively seeks hundreds of separate responses. Subject to and without waiver of these general and specific objections, Plaintiffs respond as follows: numerous documents produced by the parties in this action, numerous facts contained therein, and numerous pieces of testimony elicited during discovery support Plaintiffs' responses to Defendants' 213 Requests for Admission, and all of this evidence is already equally and fully accessible to Defendants. Based on the foregoing objections, no further response is required.

Respectfully submitted,

January 8, 2010

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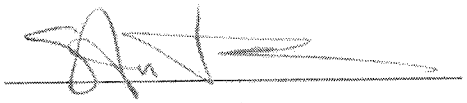
VERIFICATION FOR PLAINTIFFS VIACOM INTERNATIONAL INC., ET AL.

Information in Plaintiffs' Responses to Defendants' Third Set of Interrogatories was provided by me and/or gathered at my direction from corporate records and personnel. I have reviewed the responses. I declare under penalty of perjury under the laws of the United States that the foregoing responses as to Plaintiffs Viacom International Inc. et al. are true and correct to the best of my knowledge and belief, based on my review of such information.

Executed on January 8, 2010, in New York, New York.

Signature: 

Name: Stanley Pierre-Louis

Title: Vice President & Associate General Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on this 8th day of January, 2010, on Defendants' counsel by electronic mail pursuant to an agreement of the parties under Fed. R. Civ. P. 5(b)(2)(D).

James C. Cox

Rubin Exhibit 122

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC, Plaintiffs, v. YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE INC., Defendants.	Case No. 1:07-CV-02103-LLS (Related Case No. 1:07-CV-03582-LLS) **NOTICE OF DISMISSAL OF SPECIFIED CLIPS WITH PREJUDICE**

Pursuant to the Court's Order of December 18, 2009, which provides that "Plaintiffs may withdraw 'accused clips' by notice of their dismissal with prejudice under Fed. R. Civ. P. 41(a)(2), which I will 'So Order,'" and which further provides that "Partial judgment in defendants' favor on those claims will not be entered, lest it give an appearance of having an effect beyond that accorded by Rule 54(b)," the plaintiffs in the above-captioned action ("Viacom") hereby provide notice of the dismissal with prejudice under Fed. R. Civ. P. 41(a)(2) of the video clips listed on the attached Schedules A and B. Viacom respectfully requests that the Court "So Order" this notice of dismissal.

Schedule A lists the 241 video clips that Viacom had previously removed from its October 15, 2009 amended works in suit list, and lists six additional clips that were inadvertently included in the amended works in suit list but should have been removed. Schedule B lists 187 additional clips from four works as to which Viacom owns certain exclusive rights under copyright. Viacom did not upload or authorize the upload to YouTube of the clips listed in Schedule B, but in order to streamline the issues in this

case Viacom voluntarily withdraws its copyright infringement claims with respect to these clips. Viacom continues to pursue its infringement claims as to more than 63,000 infringing clips.

February 26, 2010

Respectfully submitted,

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SO ORDERED:

Hon. Louis L. Stanton, U.S.D.J.

Schedule A

YouTube URL	Video ID
http://www.youtube.com/watch?v=_4J1nPR9obI	_4J1nPR9obI
http://www.youtube.com/watch?v=_KDSYA5bEMc	_KDSYA5bEMc
http://www.youtube.com/watch?v=_sTgT76i3vc	_sTgT76i3vc
http://www.youtube.com/watch?v=_yr3Fu_LRE4	_yr3Fu_LRE4
http://www.youtube.com/watch?v=0mZ8VNkSPaU	0mZ8VNkSPaU
http://www.youtube.com/watch?v=0ZO5f4q8b-g	0ZO5f4q8b-g
http://www.youtube.com/watch?v=1168T5BsmVY	1168T5BsmVY
http://www.youtube.com/watch?v=17kAJR7YbDE	17kAJR7YbDE
http://www.youtube.com/watch?v=1dWtA-nK-sQ	1dWtA-nK-sQ
http://www.youtube.com/watch?v=1LOjvymWwvI	1LOjvymWwvI
http://www.youtube.com/watch?v=29le85Vp8vI	29le85Vp8vI
http://www.youtube.com/watch?v=2TncoW-J6wA	2TncoW-J6wA
http://www.youtube.com/watch?v=3US2k6mTtEw	3US2k6mTtEw
http://www.youtube.com/watch?v=3wo2FcjFP98	3wo2FcjFP98
http://www.youtube.com/watch?v=4cn9XRW_qMQ	4cn9XRW_qMQ
http://www.youtube.com/watch?v=4nLoXLBwZv0	4nLoXLBwZv0
http://www.youtube.com/watch?v=5Esm9Mlt5Xo	5Esm9Mlt5Xo
http://www.youtube.com/watch?v=5gbI2_Kocug	5gbI2_Kocug
http://www.youtube.com/watch?v=5Hd_JzIl1MA	5Hd_JzIl1MA
http://www.youtube.com/watch?v=5kWtyVo-8k0	5kWtyVo-8k0
http://www.youtube.com/watch?v=5-tUPWwEMdk	5-tUPWwEMdk
http://www.youtube.com/watch?v=5tvtDQVpq_o	5tvtDQVpq_o
http://www.youtube.com/watch?v=6_SaSuqfGB4	6_SaSuqfGB4
http://www.youtube.com/watch?v=68kDGadsbvQ	68kDGadsbvQ
http://www.youtube.com/watch?v=6WhsXvOe2IU	6WhsXvOe2IU
http://www.youtube.com/watch?v=6xFe570faSI	6xFe570faSI
http://www.youtube.com/watch?v=73mubsIY4BA	73mubsIY4BA
http://www.youtube.com/watch?v=744Gh8MbTWg	744Gh8MbTWg
http://www.youtube.com/watch?v=7aGjJBalKgs	7aGjJBalKgs
http://www.youtube.com/watch?v=83KsT9D_6aI	83KsT9D_6aI
http://www.youtube.com/watch?v=88XvlfKnGwI	88XvlfKnGwI
http://www.youtube.com/watch?v=8AYnfxZ_BXI	8AYnfxZ_BXI
http://www.youtube.com/watch?v=8v8vhNKIAZ4	8v8vhNKIAZ4
http://www.youtube.com/watch?v=-9_Nrpc8noE	-9_Nrpc8noE
http://www.youtube.com/watch?v=9A-rgw-xkjg	9A-rgw-xkjg
http://www.youtube.com/watch?v=9UClweyrV_A	9UClweyrV_A
http://www.youtube.com/watch?v=a_kdq0V9G3Y	a_kdq0V9G3Y
http://www.youtube.com/watch?v=AfiV-gllgQQ	AfiV-gllgQQ
http://www.youtube.com/watch?v=AgGf_xso0HI	AgGf_xso0HI
http://www.youtube.com/watch?v=aITz05jvTlk	aITz05jvTlk
http://www.youtube.com/watch?v=AjG9o33dQRQ	AjG9o33dQRQ
http://www.youtube.com/watch?v=ALH9IfsORXo	ALH9IfsORXo
http://www.youtube.com/watch?v=aUonqu5RIcM	aUonqu5RIcM

Schedule A

http://www.youtube.com/watch?v=aWt-fduKFmo	aWt-fduKFmo
http://www.youtube.com/watch?v=B64MeRiGDYo	B64MeRiGDYo
http://www.youtube.com/watch?v=b8kFrT6Ni08	b8kFrT6Ni08
http://www.youtube.com/watch?v=BbWi_RN9ou8	BbWi_RN9ou8
http://www.youtube.com/watch?v=bdRNAUTDBqY	bdRNAUTDBqY
http://www.youtube.com/watch?v=BrCI7t5SU-s	BrCI7t5SU-s
http://www.youtube.com/watch?v=Bsq0CpNdwpM	Bsq0CpNdwpM
http://www.youtube.com/watch?v=C2kSoDWG404	C2kSoDWG404
http://www.youtube.com/watch?v=C9h5js3n1sw	C9h5js3n1sw
http://www.youtube.com/watch?v=cjhmH21ed-c	cjhmH21ed-c
http://www.youtube.com/watch?v=cpC6E1yLTx8	cpC6E1yLTx8
http://www.youtube.com/watch?v=-cQQVfrF8Zg	-cQQVfrF8Zg
http://www.youtube.com/watch?v=cR5BCbGyTkc	cR5BCbGyTkc
http://www.youtube.com/watch?v=CSs79sYQ1_o	CSs79sYQ1_o
http://www.youtube.com/watch?v=cuDlQ_dIsyA	cuDlQ_dIsyA
http://www.youtube.com/watch?v=CxVxzXCbeOw	CxVxzXCbeOw
http://www.youtube.com/watch?v=czg16nOL_Jc	czg16nOL_Jc
http://www.youtube.com/watch?v=DkXAfEiZCs0	DkXAfEiZCs0
http://www.youtube.com/watch?v=dMNgKJsmHwo	dMNgKJsmHwo
http://www.youtube.com/watch?v=DUTtBxd2KPQ	DUTtBxd2KPQ
http://www.youtube.com/watch?v=eGXV-oXzzUE	eGXV-oXzzUE
http://www.youtube.com/watch?v=eijhloJjg50	eijhloJjg50
http://www.youtube.com/watch?v=eRR_IDApRQs	eRR_IDApRQs
http://www.youtube.com/watch?v=eV9Z-W1jqvg	eV9Z-W1jqvg
http://www.youtube.com/watch?v=f5CpR7yR8iQ	f5CpR7yR8iQ
http://www.youtube.com/watch?v=F8VPEIt2zTM	F8VPEIt2zTM
http://www.youtube.com/watch?v=fAQw55ddPfA	fAQw55ddPfA
http://www.youtube.com/watch?v=FDXmujT4MZE	FDXmujT4MZE
http://www.youtube.com/watch?v=fNU05tW62M8	fNU05tW62M8
http://www.youtube.com/watch?v=fPbDpAmxYRw	fPbDpAmxYRw
http://www.youtube.com/watch?v=F-vuYx6d1XM	F-vuYx6d1XM
http://www.youtube.com/watch?v=g0nOEudbKOQ	g0nOEudbKOQ
http://www.youtube.com/watch?v=G3mjcRVnJV4	G3mjcRVnJV4
http://www.youtube.com/watch?v=g5ce_rOoGcc	g5ce_rOoGcc
http://www.youtube.com/watch?v=GgcxPrquS2k	GgcxPrquS2k
http://www.youtube.com/watch?v=gxjpdGjv59o	gxjpdGjv59o
http://www.youtube.com/watch?v=Gy3TrIlnTvA	Gy3TrIlnTvA
http://www.youtube.com/watch?v=GYKER0CR0yk	GYKER0CR0yk
http://www.youtube.com/watch?v=H0AQehIKRB4	H0AQehIKRB4
http://www.youtube.com/watch?v=H0ZLZTR-g5Y	H0ZLZTR-g5Y
http://www.youtube.com/watch?v=hAs5LPgqFSo	hAs5LPgqFSo
http://www.youtube.com/watch?v=hfPAw9MM69A	hfPAw9MM69A
http://www.youtube.com/watch?v=Hgu1RM2vbVM	Hgu1RM2vbVM
http://www.youtube.com/watch?v=hhXlVDxYzvg	hhXlVDxYzvg

Schedule A

http://www.youtube.com/watch?v=HM4b0wcMo_0	HM4b0wcMo_0
http://www.youtube.com/watch?v=hnKQ7xzDjQ4	hnKQ7xzDjQ4
http://www.youtube.com/watch?v=hSdMtP8qztA	hSdMtP8qztA
http://www.youtube.com/watch?v=hZYpL6Vdz4k	hZYpL6Vdz4k
http://www.youtube.com/watch?v=i3YBKlAXvvk	i3YBKlAXvvk
http://www.youtube.com/watch?v=I4pc-6V4IZc	I4pc-6V4IZc
http://www.youtube.com/watch?v=i55f6qUSq4A	i55f6qUSq4A
http://www.youtube.com/watch?v=InVHaTyS6X0	InVHaTyS6X0
http://www.youtube.com/watch?v=IZdKpTkQv8g	IZdKpTkQv8g
http://www.youtube.com/watch?v=J_LMd1WMyk4	J_LMd1WMyk4
http://www.youtube.com/watch?v=j4A-BqFSSL8	j4A-BqFSSL8
http://www.youtube.com/watch?v=jD9iQbQBHiI	jD9iQbQBHiI
http://www.youtube.com/watch?v=jP_AXwoCgws	jP_AXwoCgws
http://www.youtube.com/watch?v=JZwFUe2aXLA	JZwFUe2aXLA
http://www.youtube.com/watch?v=K4sS0wA_-lA	K4sS0wA_-lA
http://www.youtube.com/watch?v=k6CSyIS5528	k6CSyIS5528
http://www.youtube.com/watch?v=KcU0ye3nXtA	KcU0ye3nXtA
http://www.youtube.com/watch?v=kg2WUirHOhw	kg2WUirHOhw
http://www.youtube.com/watch?v=kgyL9-VnhoU	kgyL9-VnhoU
http://www.youtube.com/watch?v=KhIPvn26b1A	KhIPvn26b1A
http://www.youtube.com/watch?v=KiBDCZX7HQc	KiBDCZX7HQc
http://www.youtube.com/watch?v=KNeaHNwwvvM	KNeaHNwwvvM
http://www.youtube.com/watch?v=kpkmya7Mkzk	kpkmya7Mkzk
http://www.youtube.com/watch?v=KrTB3848mgQ	KrTB3848mgQ
http://www.youtube.com/watch?v=kvEeLZV1j-k	kvEeLZV1j-k
http://www.youtube.com/watch?v=L6a_iKo83RE	L6a_iKo83RE
http://www.youtube.com/watch?v=L8GYvvm_3bE	L8GYvvm_3bE
http://www.youtube.com/watch?v=L9h0BpdVMxA	L9h0BpdVMxA
http://www.youtube.com/watch?v=Le52xv31TTM	Le52xv31TTM
http://www.youtube.com/watch?v=LeSId8yY3Do	LeSId8yY3Do
http://www.youtube.com/watch?v=liblQ3NlAjE	liblQ3NlAjE
http://www.youtube.com/watch?v=lirJJlViWsE	lirJJlViWsE
http://www.youtube.com/watch?v=ln5zXFcssSc	ln5zXFcssSc
http://www.youtube.com/watch?v=lvb3QDrHxRA	lvb3QDrHxRA
http://www.youtube.com/watch?v=L-VLn6bEOvs	L-VLn6bEOvs
http://www.youtube.com/watch?v=LYGpcUofXbk	LYGpcUofXbk
http://www.youtube.com/watch?v=lz0JZvlMrOA	lz0JZvlMrOA
http://www.youtube.com/watch?v=LzIoLR5i9uw	LzIoLR5i9uw
http://www.youtube.com/watch?v=m_lOnAYAh18	m_lOnAYAh18
http://www.youtube.com/watch?v=meXedwbvCh8	meXedwbvCh8
http://www.youtube.com/watch?v=MGZbVuVW2wQ	MGZbVuVW2wQ
http://www.youtube.com/watch?v=mJkGJQyDNQ0	mJkGJQyDNQ0
http://www.youtube.com/watch?v=mk3uiuXo4dk	mk3uiuXo4dk
http://www.youtube.com/watch?v=MMWoRIaFZM8	MMWoRIaFZM8

Schedule A

http://www.youtube.com/watch?v=mOvZn9ebc8Q	mOvZn9ebc8Q
http://www.youtube.com/watch?v=MSGNvmqcZK0	MSGNvmqcZK0
http://www.youtube.com/watch?v=mTLMUWP13pE	mTLMUWP13pE
http://www.youtube.com/watch?v=MV9EB2EXGdk	MV9EB2EXGdk
http://www.youtube.com/watch?v=N0QCkXfxJs4	N0QCkXfxJs4
http://www.youtube.com/watch?v=N-4MT9u6LUs	N-4MT9u6LUs
http://www.youtube.com/watch?v=N7Q-vFtW8Lk	N7Q-vFtW8Lk
http://www.youtube.com/watch?v=n8wDRoQkN1c	n8wDRoQkN1c
http://www.youtube.com/watch?v=N9aNvjuTIvY	N9aNvjuTIvY
http://www.youtube.com/watch?v=nCHY88De2A0	nCHY88De2A0
http://www.youtube.com/watch?v=NdpArPebjFY	NdpArPebjFY
http://www.youtube.com/watch?v=NEB7-p0aq8M	NEB7-p0aq8M
http://www.youtube.com/watch?v=neyj1SyVjBs	neyj1SyVjBs
http://www.youtube.com/watch?v=Nr8fA2kX44E	Nr8fA2kX44E
http://www.youtube.com/watch?v=NThBETSknVQ	NThBETSknVQ
http://www.youtube.com/watch?v=nyLj0T9EKAo	nyLj0T9EKAo
http://www.youtube.com/watch?v=nZ3SdIb5NDI	nZ3SdIb5NDI
http://www.youtube.com/watch?v=o8pkZ38bLvU	o8pkZ38bLvU
http://www.youtube.com/watch?v=oCbmqSqoSQk	oCbmqSqoSQk
http://www.youtube.com/watch?v=oQUgal6CFSI	oQUgal6CFSI
http://www.youtube.com/watch?v=OUWSSmNxArs	OUWSSmNxArs
http://www.youtube.com/watch?v=oXmMicS1oZk	oXmMicS1oZk
http://www.youtube.com/watch?v=p1i1wcUpTbU	p1i1wcUpTbU
http://www.youtube.com/watch?v=Pa3J-L29iT8	Pa3J-L29iT8
http://www.youtube.com/watch?v=paveBpTiNqI	paveBpTiNqI
http://www.youtube.com/watch?v=pBHnokTr1xg	pBHnokTr1xg
http://www.youtube.com/watch?v=pE2MiujT7Yg	pE2MiujT7Yg
http://www.youtube.com/watch?v=Phap3WkYOpc	Phap3WkYOpc
http://www.youtube.com/watch?v=pIGQYawzv9c	pIGQYawzv9c
http://www.youtube.com/watch?v=Ppm3MIsqsK4	Ppm3MIsqsK4
http://www.youtube.com/watch?v=PReDb3aDGDg	PReDb3aDGDg
http://www.youtube.com/watch?v=PuqX26-GCWY	PuqX26-GCWY
http://www.youtube.com/watch?v=Pvz66FuaHso	Pvz66FuaHso
http://www.youtube.com/watch?v=pyP1JFa8bJc	pyP1JFa8bJc
http://www.youtube.com/watch?v=Q_z5Kzv8_A0	Q_z5Kzv8_A0
http://www.youtube.com/watch?v=q5nDYUqEKSA	q5nDYUqEKSA
http://www.youtube.com/watch?v=qFXAl0IQiM4	qFXAl0IQiM4
http://www.youtube.com/watch?v=QrROfhjqpDs	QrROfhjqpDs
http://www.youtube.com/watch?v=Q-VvGxYDGm0	Q-VvGxYDGm0
http://www.youtube.com/watch?v=r_c6WIbOG2M	r_c6WIbOG2M
http://www.youtube.com/watch?v=r0WZATT9P9g	r0WZATT9P9g
http://www.youtube.com/watch?v=rDOB6g2-3FU	rDOB6g2-3FU
http://www.youtube.com/watch?v=REQFHAKXrgw	REQFHAKXrgw
http://www.youtube.com/watch?v=rf3BHTB2RAY	rf3BHTB2RAY

Schedule A

http://www.youtube.com/watch?v=RhNehWcBADg	RhNehWcBADg
http://www.youtube.com/watch?v=rig59Nf9qRw	rig59Nf9qRw
http://www.youtube.com/watch?v=rkQ9C-9pWJg	rkQ9C-9pWJg
http://www.youtube.com/watch?v=RRrB_hitU-c	RRrB_hitU-c
http://www.youtube.com/watch?v=s0e_IfSMtlI	s0e_IfSMtlI
http://www.youtube.com/watch?v=S5pUWE1WGKw	S5pUWE1WGKw
http://www.youtube.com/watch?v=s8VLwpyYtB0	s8VLwpyYtB0
http://www.youtube.com/watch?v=scK1yTVqE3Y	scK1yTVqE3Y
http://www.youtube.com/watch?v=sIXfcdZbnUw	sIXfcdZbnUw
http://www.youtube.com/watch?v=SVlIle_fwMg	SVlIle_fwMg
http://www.youtube.com/watch?v=SwyufkyHfyU	SwyufkyHfyU
http://www.youtube.com/watch?v=sxNuomEUGG0	sxNuomEUGG0
http://www.youtube.com/watch?v=t2KaB5IW8XA	t2KaB5IW8XA
http://www.youtube.com/watch?v=T3ysjszEu1s	T3ysjszEu1s
http://www.youtube.com/watch?v=tbU_2WGlqkU	tbU_2WGlqkU
http://www.youtube.com/watch?v=TZv0POyzkpc	TZv0POyzkpc
http://www.youtube.com/watch?v=udfXAGkZCp0	udfXAGkZCp0
http://www.youtube.com/watch?v=UE8M1Pc8PIE	UE8M1Pc8PIE
http://www.youtube.com/watch?v=uJg2geqHK5U	uJg2geqHK5U
http://www.youtube.com/watch?v=uK8e9xY3eFM	uK8e9xY3eFM
http://www.youtube.com/watch?v=uSd7BLvN9KQ	uSd7BLvN9KQ
http://www.youtube.com/watch?v=USds5DhScmg	USds5DhScmg
http://www.youtube.com/watch?v=Ux6aFYuTYNY	Ux6aFYuTYNY
http://www.youtube.com/watch?v=UXmn2TS_ALQ	UXmn2TS_ALQ
http://www.youtube.com/watch?v=UZir_FIgXQg	UZir_FIgXQg
http://www.youtube.com/watch?v=v0uIAyq4p2o	v0uIAyq4p2o
http://www.youtube.com/watch?v=v5XPki6Nj6k	v5XPki6Nj6k
http://www.youtube.com/watch?v=vAGC2_ux-GE	vAGC2_ux-GE
http://www.youtube.com/watch?v=VbDA1XS6M6A	VbDA1XS6M6A
http://www.youtube.com/watch?v=VdFd278uM7U	VdFd278uM7U
http://www.youtube.com/watch?v=Vj9rdT-t8Lc	Vj9rdT-t8Lc
http://www.youtube.com/watch?v=vjQbOSjMuAU	vjQbOSjMuAU
http://www.youtube.com/watch?v=vlQhux5mXfY	vlQhux5mXfY
http://www.youtube.com/watch?v=vNgoUewhYTM	vNgoUewhYTM
http://www.youtube.com/watch?v=vPThn1deQTw	vPThn1deQTw
http://www.youtube.com/watch?v=vrwtQRZcg6U	vrwtQRZcg6U
http://www.youtube.com/watch?v=w-0x-Pwtbtw	w-0x-Pwtbtw
http://www.youtube.com/watch?v=W2CyxzhHgrw	W2CyxzhHgrw
http://www.youtube.com/watch?v=w4ONAjIFmJY	w4ONAjIFmJY
http://www.youtube.com/watch?v=WBxZLCDm2uo	WBxZLCDm2uo
http://www.youtube.com/watch?v=wcHwE01xHNU	wcHwE01xHNU
http://www.youtube.com/watch?v=wfWEjb3DtV0	wfWEjb3DtV0
http://www.youtube.com/watch?v=WLZfSH3j_Zg	WLZfSH3j_Zg
http://www.youtube.com/watch?v=wMHpbGDIddE	wMHpbGDIddE

Schedule A

http://www.youtube.com/watch?v=WNFBtL2vGc4	WNFBtL2vGc4
http://www.youtube.com/watch?v=WPsZQRv5Ukc	WPsZQRv5Ukc
http://www.youtube.com/watch?v=Wqq-lfH3NNc	Wqq-lfH3NNc
http://www.youtube.com/watch?v=wxhRkff16ys	wxhRkff16ys
http://www.youtube.com/watch?v=x1ycbHjePjM	x1ycbHjePjM
http://www.youtube.com/watch?v=X-8UmL4lpPI	X-8UmL4lpPI
http://www.youtube.com/watch?v=xbrJOliv0qE	xbrJOliv0qE
http://www.youtube.com/watch?v=xHVqXaC-NIA	xHVqXaC-NIA
http://www.youtube.com/watch?v=xiFajP-KVzE	xiFajP-KVzE
http://www.youtube.com/watch?v=xlvJ7C0x91U	xlvJ7C0x91U
http://www.youtube.com/watch?v=xmHsafia5jE	xmHsafia5jE
http://www.youtube.com/watch?v=Xo9TWFRIUN8	Xo9TWFRIUN8
http://www.youtube.com/watch?v=xWCkluxpGW8	xWCkluxpGW8
http://www.youtube.com/watch?v=YbCNhLX-mi8	YbCNhLX-mi8
http://www.youtube.com/watch?v=YJbL7euTy7s	YJbL7euTy7s
http://www.youtube.com/watch?v=yJ-LoP2jiLw	yJ-LoP2jiLw
http://www.youtube.com/watch?v=YS99-zJrGhU	YS99-zJrGhU
http://www.youtube.com/watch?v=ytFpClL6ydU	ytFpClL6ydU
http://www.youtube.com/watch?v=yVUAvM3fvXQ	yVUAvM3fvXQ
http://www.youtube.com/watch?v=Zk75nDsKjNw	Zk75nDsKjNw
http://www.youtube.com/watch?v=ZpVZoLTAiKY	ZpVZoLTAiKY
http://www.youtube.com/watch?v=Zr5qTqgZubA	Zr5qTqgZubA

Clips Inadvertently Included on October 15, 2009 Amended Works In Suit List	
YouTube URL	**Video ID**
http://www.youtube.com/watch?v=6w5MPpg1XpE	6w5MPpg1XpE
http://www.youtube.com/watch?v=8_Eaa7y_rq0	8_Eaa7y_rq0
http://www.youtube.com/watch?v=AEkerwX8IFo	AEkerwX8IFo
http://www.youtube.com/watch?v=S-hSrAGA4Gg	S-hSrAGA4Gg
http://www.youtube.com/watch?v=VQg9_eyp_AA	VQg9_eyp_AA
http://www.youtube.com/watch?v=z3cRGYXyRnI	z3cRGYXyRnI

Schedule B

ALFIE (2004)	
YouTube URL	**Video ID**
http://www.youtube.com/watch?v=BO5-4uPZXmw	BO5-4uPZXmw
http://www.youtube.com/watch?v=EX87URRiJdo	EX87URRiJdo
http://www.youtube.com/watch?v=Hbh90s4tpBc	Hbh90s4tpBc
http://www.youtube.com/watch?v=ldJ2A8yZjQk	ldJ2A8yZjQk
http://www.youtube.com/watch?v=PxbBwmtiKCM	PxbBwmtiKCM
http://www.youtube.com/watch?v=xzdeeXtJ-GM	xzdeeXtJ-GM
http://www.youtube.com/watch?v=_xM1wE3j-U8	_xM1wE3j-U8
http://www.youtube.com/watch?v=ejdmAR_pbe0	ejdmAR_pbe0
http://www.youtube.com/watch?v=S0KIA79b9Zk	S0KIA79b9Zk
http://www.youtube.com/watch?v=T1ThKDNGafs	T1ThKDNGafs
http://www.youtube.com/watch?v=jEpinkgZ_Mo	jEpinkgZ_Mo
http://www.youtube.com/watch?v=vLuGhhHfndo	vLuGhhHfndo
http://www.youtube.com/watch?v=f6i35YX40MQ	f6i35YX40MQ
http://www.youtube.com/watch?v=pHMRBoG5O4s	pHMRBoG5O4s
http://www.youtube.com/watch?v=urebQXHSmfQ	urebQXHSmfQ
http://www.youtube.com/watch?v=ZapOB1fQStE	ZapOB1fQStE

APOCALYPSE NOW	
YouTube URL	**Video ID**
http://www.youtube.com/watch?v=I-1wmt_odDU	I-1wmt_odDU
http://www.youtube.com/watch?v=itIDg6sXgbo	itIDg6sXgbo
http://www.youtube.com/watch?v=LDGHIt-AAJE	LDGHIt-AAJE
http://www.youtube.com/watch?v=LlI4Qs_k6p0	LlI4Qs_k6p0
http://www.youtube.com/watch?v=mAZrXJSPqqw	mAZrXJSPqqw
http://www.youtube.com/watch?v=n3L2QbSa7T8	n3L2QbSa7T8
http://www.youtube.com/watch?v=n7N46IENb_E	n7N46IENb_E
http://www.youtube.com/watch?v=nmfrNvbYlSo	nmfrNvbYlSo
http://www.youtube.com/watch?v=nUF2D_NjlqY	nUF2D_NjlqY
http://www.youtube.com/watch?v=osSUIPPk5Mk	osSUIPPk5Mk
http://www.youtube.com/watch?v=pwqdBkaWsTA	pwqdBkaWsTA
http://www.youtube.com/watch?v=RwnBWSdZDzQ	RwnBWSdZDzQ
http://www.youtube.com/watch?v=UemtjPU5sFc	UemtjPU5sFc
http://www.youtube.com/watch?v=uxw0bTVZ9JU	uxw0bTVZ9JU
http://www.youtube.com/watch?v=v34d9kKnv_w	v34d9kKnv_w
http://www.youtube.com/watch?v=VDMtwSkg528	VDMtwSkg528

Schedule B

http://www.youtube.com/watch?v=vjNtGHDRspo	vjNtGHDRspo
http://www.youtube.com/watch?v=-zkcNB0f5KI	-zkcNB0f5KI
http://www.youtube.com/watch?v=TAbmUGy3i6I	TAbmUGy3i6I
http://www.youtube.com/watch?v=XjYhTnh6Zaw	XjYhTnh6Zaw
http://www.youtube.com/watch?v=XKcTSKQeuYc	XKcTSKQeuYc
http://www.youtube.com/watch?v=XOxVjtZujcU	XOxVjtZujcU
http://www.youtube.com/watch?v=z5eXFeW0aI0	z5eXFeW0aI0
http://www.youtube.com/watch?v=zLRj5erjhP8	zLRj5erjhP8
http://www.youtube.com/watch?v=pVi1je1tCZg	pVi1je1tCZg

The Spirit of Christmas (Jesus vs. Frosty)	
YouTube URL	**Video ID**
http://www.youtube.com/watch?v=3MY1-1pbc5A	3MY1-1pbc5A
http://www.youtube.com/watch?v=BxWDPBIbABw	BxWDPBIbABw
http://www.youtube.com/watch?v=C8WIu4Lji9o	C8WIu4Lji9o
http://www.youtube.com/watch?v=EFhgW9LpSig	EFhgW9LpSig
http://www.youtube.com/watch?v=grchratYFn0	grchratYFn0
http://www.youtube.com/watch?v=JSR6u62qRow	JSR6u62qRow
http://www.youtube.com/watch?v=tZF8vTvxQuw	tZF8vTvxQuw
http://www.youtube.com/watch?v=Ud7Ga8zPga4	Ud7Ga8zPga4
http://www.youtube.com/watch?v=Zke-Cf-jtmk	Zke-Cf-jtmk
http://www.youtube.com/watch?v=zKTttir-ADs	zKTttir-ADs
http://www.youtube.com/watch?v=ZK-YTEmNM7s	ZK-YTEmNM7s
http://www.youtube.com/watch?v=Zse02bHcWqg	Zse02bHcWqg

The Spirit of Christmas (Jesus vs. Santa)	
YouTube URL	**Video ID**
http://www.youtube.com/watch?v=_obmo_Ib8P8	_obmo_Ib8P8
http://www.youtube.com/watch?v=-_t4Xo1G4yo	-_t4Xo1G4yo
http://www.youtube.com/watch?v=1Eb8MJX-EVY	1Eb8MJX-EVY
http://www.youtube.com/watch?v=1ndaYeMwhYI	1ndaYeMwhYI
http://www.youtube.com/watch?v=25BGqF7Hje4	25BGqF7Hje4
http://www.youtube.com/watch?v=2F10c5pxIAI	2F10c5pxIAI
http://www.youtube.com/watch?v=2k44sfPR6ig	2k44sfPR6ig
http://www.youtube.com/watch?v=2Q3QE3LL1Dk	2Q3QE3LL1Dk
http://www.youtube.com/watch?v=2s0UunMx1xs	2s0UunMx1xs
http://www.youtube.com/watch?v=3audz0BAyWY	3audz0BAyWY
http://www.youtube.com/watch?v=3CL9GIJloLk	3CL9GIJloLk
http://www.youtube.com/watch?v=3HY4aZAQFpk	3HY4aZAQFpk
http://www.youtube.com/watch?v=3NJAz1-ysGs	3NJAz1-ysGs
http://www.youtube.com/watch?v=3nrEwWVaEXY	3nrEwWVaEXY
http://www.youtube.com/watch?v=3qu-wh1ppZ8	3qu-wh1ppZ8
http://www.youtube.com/watch?v=4eASyLoHlJw	4eASyLoHlJw
http://www.youtube.com/watch?v=4icAtPkcSWw	4icAtPkcSWw
http://www.youtube.com/watch?v=4q3OImUHwdY	4q3OImUHwdY

Schedule B

http://www.youtube.com/watch?v=4V8KmrCgJzo	4V8KmrCgJzo
http://www.youtube.com/watch?v=4vu9_66O3Sg	4vu9_66O3Sg
http://www.youtube.com/watch?v=58s-ODz2tQQ	58s-ODz2tQQ
http://www.youtube.com/watch?v=59IJOyEs_og	59IJOyEs_og
http://www.youtube.com/watch?v=5rNSIYLQwMs	5rNSIYLQwMs
http://www.youtube.com/watch?v=5uIlN6CZ9WU	5uIlN6CZ9WU
http://www.youtube.com/watch?v=7JeEy71nCL4	7JeEy71nCL4
http://www.youtube.com/watch?v=8giDuL8ZhQE	8giDuL8ZhQE
http://www.youtube.com/watch?v=8lRJp5G_IPM	8lRJp5G_IPM
http://www.youtube.com/watch?v=8VyNheEazvo	8VyNheEazvo
http://www.youtube.com/watch?v=9mLPIzGWxGs	9mLPIzGWxGs
http://www.youtube.com/watch?v=9y4XhBdDa1o	9y4XhBdDa1o
http://www.youtube.com/watch?v=9z48-HEBgUQ	9z48-HEBgUQ
http://www.youtube.com/watch?v=9zt0Ecgxiak	9zt0Ecgxiak
http://www.youtube.com/watch?v=AhJwZfwUqcs	AhJwZfwUqcs
http://www.youtube.com/watch?v=aMAbFn2aLag	aMAbFn2aLag
http://www.youtube.com/watch?v=apJ3DCijl3U	apJ3DCijl3U
http://www.youtube.com/watch?v=aS4ruwA-Dbs	aS4ruwA-Dbs
http://www.youtube.com/watch?v=AvXbAh-UtTA	AvXbAh-UtTA
http://www.youtube.com/watch?v=b_-oESzWcu8	b_-oESzWcu8
http://www.youtube.com/watch?v=b-1vkoHg0y8	b-1vkoHg0y8
http://www.youtube.com/watch?v=B7k5hRzE584	B7k5hRzE584
http://www.youtube.com/watch?v=bd6YEu-qdAY	bd6YEu-qdAY
http://www.youtube.com/watch?v=BDlhfBeks14	BDlhfBeks14
http://www.youtube.com/watch?v=Be5a_wb_DHQ	Be5a_wb_DHQ
http://www.youtube.com/watch?v=bfnjrvnDpCk	bfnjrvnDpCk
http://www.youtube.com/watch?v=bHSbpj30iCA	bHSbpj30iCA
http://www.youtube.com/watch?v=BjXVcIfmz1Q	BjXVcIfmz1Q
http://www.youtube.com/watch?v=BmG2B6fRRIs	BmG2B6fRRIs
http://www.youtube.com/watch?v=bohPcVGVajM	bohPcVGVajM
http://www.youtube.com/watch?v=bqmllceqaDU	bqmllceqaDU
http://www.youtube.com/watch?v=BsvKOZWAkcc	BsvKOZWAkcc
http://www.youtube.com/watch?v=bZIO8UlzIzI	bZIO8UlzIzI
http://www.youtube.com/watch?v=cBxytQhjr2A	cBxytQhjr2A
http://www.youtube.com/watch?v=daTK3_0I7_g	daTK3_0I7_g
http://www.youtube.com/watch?v=dieSvM3bdWU	dieSvM3bdWU
http://www.youtube.com/watch?v=dnE58TKtulk	dnE58TKtulk
http://www.youtube.com/watch?v=DtFSCeSJP78	DtFSCeSJP78
http://www.youtube.com/watch?v=E-_MHM-wo-4	E-_MHM-wo-4
http://www.youtube.com/watch?v=eGn3Uy6XCA8	eGn3Uy6XCA8
http://www.youtube.com/watch?v=EjOePlLAyZA	EjOePlLAyZA
http://www.youtube.com/watch?v=F6IbG22ktKM	F6IbG22ktKM
http://www.youtube.com/watch?v=F7fLPLJmpuM	F7fLPLJmpuM
http://www.youtube.com/watch?v=fQDvZ_V_6Tk	fQDvZ_V_6Tk
http://www.youtube.com/watch?v=fS2QLLM7HH0	fS2QLLM7HH0
http://www.youtube.com/watch?v=gfYa5l1qoAc	gfYa5l1qoAc

Schedule B

http://www.youtube.com/watch?v=gNfBJkm1WxM	gNfBJkm1WxM
http://www.youtube.com/watch?v=HdrfwKzfmEY	HdrfwKzfmEY
http://www.youtube.com/watch?v=HgmKFZz-Tzg	HgmKFZz-Tzg
http://www.youtube.com/watch?v=hpw09dZcLOY	hpw09dZcLOY
http://www.youtube.com/watch?v=hTjv5bLtoKU	hTjv5bLtoKU
http://www.youtube.com/watch?v=j0pV8A2tZmQ	j0pV8A2tZmQ
http://www.youtube.com/watch?v=J834njcbv50	J834njcbv50
http://www.youtube.com/watch?v=JheVEwMIipE	JheVEwMIipE
http://www.youtube.com/watch?v=JMLbF657c1o	JMLbF657c1o
http://www.youtube.com/watch?v=JYs6_S07pbo	JYs6_S07pbo
http://www.youtube.com/watch?v=JZjemHIluZU	JZjemHIluZU
http://www.youtube.com/watch?v=K4i8fcYNMyk	K4i8fcYNMyk
http://www.youtube.com/watch?v=L6NJNKPVobw	L6NJNKPVobw
http://www.youtube.com/watch?v=LfpYrDa2z00	LfpYrDa2z00
http://www.youtube.com/watch?v=LIQja0yLwEA	LIQja0yLwEA
http://www.youtube.com/watch?v=lIsXYO1bVoE	lIsXYO1bVoE
http://www.youtube.com/watch?v=m5AhryUa7Ok	m5AhryUa7Ok
http://www.youtube.com/watch?v=Mb2GnXXS684	Mb2GnXXS684
http://www.youtube.com/watch?v=mdl0HyOoows	mdl0HyOoows
http://www.youtube.com/watch?v=Mf4bO5FwYng	Mf4bO5FwYng
http://www.youtube.com/watch?v=MpTzQFcAulo	MpTzQFcAulo
http://www.youtube.com/watch?v=MTfMX2W45jM	MTfMX2W45jM
http://www.youtube.com/watch?v=-n1potX2MEc	-n1potX2MEc
http://www.youtube.com/watch?v=NR6WmgJKUdg	NR6WmgJKUdg
http://www.youtube.com/watch?v=NVwBFWU0PMY	NVwBFWU0PMY
http://www.youtube.com/watch?v=o6uVS-EfjRY	o6uVS-EfjRY
http://www.youtube.com/watch?v=oap8h7AE6Ng	oap8h7AE6Ng
http://www.youtube.com/watch?v=OulxJm18Vxw	OulxJm18Vxw
http://www.youtube.com/watch?v=Ow-GHIKckUU	Ow-GHIKckUU
http://www.youtube.com/watch?v=P0DXt7MWdZ8	P0DXt7MWdZ8
http://www.youtube.com/watch?v=P0ZOfYnkGs4	P0ZOfYnkGs4
http://www.youtube.com/watch?v=PFMHKOPuTs4	PFMHKOPuTs4
http://www.youtube.com/watch?v=Pw8WZD5T8Wc	Pw8WZD5T8Wc
http://www.youtube.com/watch?v=qBcAI_WjUnU	qBcAI_WjUnU
http://www.youtube.com/watch?v=QGQjDswbvCM	QGQjDswbvCM
http://www.youtube.com/watch?v=qUGu0s-kOWc	qUGu0s-kOWc
http://www.youtube.com/watch?v=Rud4ur6fwrA	Rud4ur6fwrA
http://www.youtube.com/watch?v=sKLj7qtbrr0	sKLj7qtbrr0
http://www.youtube.com/watch?v=sM_uepoWUH4	sM_uepoWUH4
http://www.youtube.com/watch?v=sPxk79PjZUY	sPxk79PjZUY
http://www.youtube.com/watch?v=swQj8kpSQ7c	swQj8kpSQ7c
http://www.youtube.com/watch?v=SX-XFyizsQ4	SX-XFyizsQ4
http://www.youtube.com/watch?v=T4O-34s8QfE	T4O-34s8QfE
http://www.youtube.com/watch?v=t6vvxnk5VFw	t6vvxnk5VFw
http://www.youtube.com/watch?v=tH7XD5az8XU	tH7XD5az8XU
http://www.youtube.com/watch?v=TL6kYwjrbCA	TL6kYwjrbCA

Schedule B

http://www.youtube.com/watch?v=T-Ub271PVYU	T-Ub271PVYU
http://www.youtube.com/watch?v=u3EMWZiUu0U	u3EMWZiUu0U
http://www.youtube.com/watch?v=uL0-a40va64	uL0-a40va64
http://www.youtube.com/watch?v=UotFGR0E3U0	UotFGR0E3U0
http://www.youtube.com/watch?v=u-qIJ04T_QU	u-qIJ04T_QU
http://www.youtube.com/watch?v=UtwRERD22JQ	UtwRERD22JQ
http://www.youtube.com/watch?v=UyAkhMh9ukA	UyAkhMh9ukA
http://www.youtube.com/watch?v=V2fZzNvjDaE	V2fZzNvjDaE
http://www.youtube.com/watch?v=vmt_KrMiIDA	vmt_KrMiIDA
http://www.youtube.com/watch?v=Vrhs12CclWM	Vrhs12CclWM
http://www.youtube.com/watch?v=vZ1S-Fy7e7E	vZ1S-Fy7e7E
http://www.youtube.com/watch?v=w2y1WP6RVOU	w2y1WP6RVOU
http://www.youtube.com/watch?v=wgiwYkVbyhk	wgiwYkVbyhk
http://www.youtube.com/watch?v=WmM2og7RxhY	WmM2og7RxhY
http://www.youtube.com/watch?v=wwcAjFKvvV8	wwcAjFKvvV8
http://www.youtube.com/watch?v=wyTIc3rKPyE	wyTIc3rKPyE
http://www.youtube.com/watch?v=WzSOAH7ryok	WzSOAH7ryok
http://www.youtube.com/watch?v=X_XIBRCfSIk	X_XIBRCfSIk
http://www.youtube.com/watch?v=XcGbneD4DGU	XcGbneD4DGU
http://www.youtube.com/watch?v=xIqxqdj-YFc	xIqxqdj-YFc
http://www.youtube.com/watch?v=y99ln60bozo	y99ln60bozo
http://www.youtube.com/watch?v=zbGEUDz_zUQ	zbGEUDz_zUQ
http://www.youtube.com/watch?v=zqkK9yuzl04	zqkK9yuzl04
http://www.youtube.com/watch?v=zr8GZ53nUoY	zr8GZ53nUoY

Rubin Exhibit 123

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC,	)	
Plaintiffs,	)	
vs.	)	Case No.
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	07CV-2103
Defendants.	)	
THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated,	)	
Plaintiffs,	)	
vs.	)	Case No.
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	07CV-3582
Defendants.	)	

****HIGHLY CONFIDENTIAL****
DEPOSITION OF THOMAS DONOHUE
NEW YORK, NEW YORK
FRIDAY, OCTOBER 30, 2009
9:46 a.m.

BY: REBECCA SCHAUMLOFFEL
JOB NO. 17991

E-mail in the string when he said that the -- that "We, Wiredset, were authorized by MTV to use their videos on YouTube"?

12:09:20

A. We were authorized by our client, MTV. And I think in this case, either the marketing or promotion department of MTV -- whether or not MTV's marketing department and their legal department or Viacom's legal department were on the same page, I don't know. But I can say that we were authorized to do what we did.

12:09:34

12:09:46

Q. So when you say, "We were authorized to do what we did," you mean Wiredset was authorized to upload videos to YouTube that Viacom requested that it upload to YouTube?

12:09:57

MS. CUNHA: Objection.

Asked and answered.

A. We were authorized to promote, upload the clips, whatever clips we are talking about, by our contacts at MTV.

12:10:24

Rubin Exhibit 124

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC., COMEDY PARTNERS, COUNTRY MUSIC TELEVISION, INC., PARAMOUNT PICTURES CORPORATION, and BLACK ENTERTAINMENT TELEVISION LLC,	)	
Plaintiffs,	)	
vs.	)	Case No.
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	07CV-2103
Defendants.	)	
THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED, BOURNE CO., et al., on behalf of themselves and all others similarly situated,	)	
Plaintiffs,	)	
vs.	)	Case No.
YOUTUBE, INC., YOUTUBE, LLC, and GOOGLE, INC.,	)	07CV-3582
Defendants.	)	

****HIGHLY CONFIDENTIAL****
DEPOSITION OF THOMAS DONOHUE
NEW YORK, NEW YORK
FRIDAY, OCTOBER 30, 2009
9:46 a.m.

BY: REBECCA SCHAUMLOFFEL
JOB NO. 17991

relationship?

Q. Ever in the course of the relationship, anyone you can think of.

10:42:56 A. Those were the ones that were specifically tasked with managing the projects, typically, as far as I can remember. It is possible other employees may have -- yes.

10:43:22 MS. REES: Exhibit 7.

(Whereupon, a document, WS-00317-'00318, was marked as Defendant's Exhibit 7 for identification as of this date by

10:43:57 the Reporter.)

Q. Can you identify Exhibit 7?

A. It appears to be an internal E-mail from Wiredset.

Q. One of the participants is

10:44:10 Katrina Alvarez who you just mentioned?

A. Is that a question?

Q. Is one of the participants in this E-mail chain Katrina Alvarez, who you just mentioned?

10:44:17 A. Yes, it appears to be.

Q. Is this -- at the top of the page, is this Katrina Alvarez's E-mail address, Katrinaa@wiredset.com?

10:44:27 A. No. Sorry; yes, it is.

Q. Is that her E-mail address, Katrinaa@wiredset.com?

A. Yes.

MS. REES: Exhibit 8.

10:44:54 (Whereupon, a document, WS-04443-'04447, was marked as Defendant's Exhibit 8 for identification as of this date by the Reporter.)

10:45:19 Q. Can you identify Exhibit 8?

A. It appears to be an E-mail from Wiredset to YouTube.

Q. And the E-mail appears to reflect that Wiredset is setting up an

10:46:10 account on YouTube with the username, Wiredset. Do you understand that Wiredset has an account on YouTube with the username, Wiredset?

MR. MULLANEY: Objection to

10:46:21 form.

Rubin Exhibit 125

From: Myers, Jake - Paramount Vantage [jake.myers@paramountvantage.com]
Sent: Saturday, March 01, 2008 1:47 AM
To: Kelly Seaman
Cc: Teifeld, Tamar - Paramount; Andrea Cordone; Arian Hormozi; Mark Hall; Sarah Cruz; Sean Ray
Subject: [text][html] RE: [text][heur] Re: [C#246525705] DMCA Counter Notification - from: TheFilmFactoryUK - re:Paramount Pictures Corp.

I was fine with them up. We do not need to take them down.

Thanks,

Jake Myers
Paramount Vantage
Interactive Marketing
5555 Melrose Ave., Lasky 108
Los Angeles, CA 90038
Ph: 323.956.2876
AIM: jakemyers2001

How She Move
In Theaters Now
www.howshemove.com

From: Kelly Seaman [mailto:kseaman@google.com]
Sent: Friday, February 29, 2008 5:44 PM
To: Myers, Jake - Paramount Vantage
Cc: Teifeld, Tamar - Paramount; Andrea Cordone; Arian Hormozi; Hall, Mark - Paramount; Sarah Cruz; Sean Ray
Subject: Re: [text][heur] Re: [C#246525705] DMCA Counter Notification - from: TheFilmFactoryUK - re:Paramount Pictures Corp.

That is correct. Jake, those videos can be taken down now if that's your preference.

On Fri, Feb 29, 2008 at 5:28 PM, Myers, Jake - Paramount Vantage <jake.myers@paramountvantage.com> wrote:
I uploaded all these per the request of Kelly Seaman from Youtube, for
their Oscar showcase...

Jake Myers
Paramount Vantage
Interactive Marketing
5555 Melrose Ave., Lasky 108
Los Angeles, CA 90038
Ph: 323.956.2876
AIM: jakemyers2001

How She Move
In Theaters Now
www.howshemove.com

-----Original Message-----
From: Teifeld, Tamar - Paramount
Sent: Friday, February 29, 2008 5:07 PM
To: 'Andrea Cordone'
Cc: Arian Hormozi; Hall, Mark - Paramount; Sarah Cruz; Sean Ray; Myers,
Jake - Paramount Vantage

6/23/2008

Subject: RE: [text][heur] Re: [C#246525705] DMCA Counter Notification - from: TheFilmFactoryUK - re:Paramount Pictures Corp.

There will be blood is a Vantage film. Jake from the online team there can help you with this. He is CC'd here.

-----Original Message-----
From: Andrea Cordone [mailto:andreac@baytsp.com]
Sent: Friday, February 29, 2008 3:21 PM
To: Teifeld, Tamar - Paramount
Cc: Arian Hormozi; Hall, Mark - Paramount; Sarah Cruz; Sean Ray
Subject: FW: [text][heur] Re: [C#246525705] DMCA Counter Notification - from: TheFilmFactoryUK - re:Paramount Pictures Corp.

Hello Tamar,

Today we received the following counter- notification, however it is unclear whether the content is infringing. I have attached a copy of the clip for your review.

The identifying information is as follows:

Notice ID: 10679
Asset: THERE WILL BE BLOOD
Protocol: YouTube
Video Title: There Will Be Blood - We Have Oil Here
Video Length: 137
Timestamp: 27 Feb 2008 07:59:10 GMT
Last Seen Date: 27 Feb 2008 08:06:09 GMT
URL: http://www.youtube.com/watch?v=ohtElSm4ce0
Username (if available): TheFilmFactoryUK

Please let us know what action to proceed with.

Best Regards,

Andrea Cordone
Client Services Manager
BayTSP, Inc.
408.341.2365
andreac@baytsp.com

The information contained in this email message may be confidential and is intended only for the parties to whom it is addressed. If you are not the intended recipient or an agent of same, please notify us of the mistake by telephone (408-341-2300) or email and delete the message from your system. Please do not copy the message or distribute it to anyone. This message was prepared at the request of counsel.

-----Original Message-----
From: Nicole Manske
Sent: Friday, February 29, 2008 8:17 AM
To: Andrea Cordone
Cc: Arian Hormozi; Leland Woo
Subject: FW: [text][heur] Re: [C#246525705] DMCA Counter Notification - from: TheFilmFactoryUK - re:Paramount Pictures Corp.

Here is a counter notice for Paramount.

Nicole Manske
Compliance Administrator :: BayTSP Inc.
PO Box 1314 Los Gatos, CA 95031
www.baytsp.com
408-341-2300 - Main
408-341-2342 - Direct
408-341-2399 - Fax

The information contained in this email message may be confidential and is intended only for the parties to whom it is addressed. If you are not the intended recipient or an agent of same, please notify us of the mistake by telephone or email and delete the message from your system. Please do not copy the message or distribute it to anyone

-----Original Message-----
From: Copyright Service [mailto:copyright@youtube.com]
Sent: Thursday, February 28, 2008 8:14 PM
To: Copyright-Compliance
Subject: [text][heur] Re: [C#246525705] DMCA Counter Notification - from: TheFilmFactoryUK - re:Paramount Pictures Corp.

Hi there,

We received the attached counter-notification in response to a complaint you filed with us. As described in the United States Digital Millennium Copyright Act (DMCA) 17 U.S.C. 512, by this email, we're providing you with the counter-notification and await your notice (in not more than 10 days) that you've filed an action seeking a court order to restrain the counter-notifier's allegedly infringing activity. Such notice should be submitted by replying to this email. If we don't receive notice from you,
we will reinstate the material to YouTube.

If you have any questions, please contact copyright@youtube.com.

Sincerely,

Harry
The YouTube Team

Original Message Follows:

From: Jim Forsyth <jim.forsyth@theppc.com>
Subject: YouTube DMCA Counter-Notification
Date: Thu, 28 Feb 2008 10:00:13 +0000

Dear YouTube,

6/23/2008

I am the producer for www.therewillbeblood.co.uk - the UK site for the movie, 'There Will Be Blood'. All clips that we have used on this site and
YouTube have been ok'd by Paramount Pictures.

Please put the video back up on YouTube as there is no good reason for it
to
have been taken down.

Kind Regards

Jim

1. URL: There Will Be Blood - We Have Oil Here:
http://uk.youtube.com/watch?v=ohtElSm4ce0

2. Jim Forsyth, 91 Berwick Street, London, Soho UK. -
jim.forsyth@theppc.com
YouTube username: TheFilmFactoryUK

3. I consent to the jurisdiction of Federal District Court for the judicial
district in which your address is located (or San Francisco County, California if your address is outside of the United States), and that you
will accept service of process from the person who provided notification under subsection (c)(1)(C) or an agent of such person.

4. I swear, under penalty of perjury, that I have a good faith belief that
the material was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled.

5. Signature attached.

This email has been scanned for all viruses by the MessageLabs SkyScan service.

--
Kelly Seaman
Content Partnerships
YouTube
901 Cherry Avenue
San Bruno, CA 94066
kseaman@youtube.com
P: 650-214-1331
F: 650-963-3367

Rubin Exhibit 126

From: Courtney Nieman
Sent: Tuesday, March 27, 2007 4:50 PM
To: Deana Arizala; Richard Kawasaki; Solow, Warren
Cc: RADAR; AST; csm
Subject: FW: Paramount International

More from Paramount Marketing

Courtney Nieman

From: Tipton, Kristina - Paramount [mailto:Kristina_Tipton@Paramount.com]
Sent: Monday, March 26, 2007 6:55 PM
To: Courtney Nieman
Cc: Mark M. Ishikawa; Evelyn Espinosa; Al Perry; Williams, Carrie - Paramount
Subject: Paramount International

Hi Courtney,

Hope all is well with you. I wanted to send along some of the video syndication being done by our International team. Carrie Williams (cc'ed) is the manager based in Los Angeles who helps coordinate all the territories' work online. She may be sending along links and other video information from time to time. See below for recent syndication efforts – let me know if you need any additional information on any of the below.

Thanks, Courtney!

Kristina Tipton
Interactive Marketing
Paramount Pictures
323-956-8453

Film Title: **Transformers**

VW: http://www.youtube.com/watch?v=axZWLhPp4tA

Dino: http://www.youtube.com/watch?v=JW69bluAsNo

Insecto: http://www.youtube.com/watch?v=B4QmFL_hArI

User and password:

[redacted]

Film title: **Shrek the Third**
Name of clip: **Shrek the Third trailer**
Duration: **2 minutes and 3 seconds**
Name of account: **matthewwhite**
Date of upload: **23 March 2007**

Google Video
Film title - BEE MOVIE

6/23/2008

Name of clip – BEE MOVIE TRAILER - COMING DECEMBER 2007
Name of account – wez@waytoblue.com
Date of upload – 15/03/2007
URL - http://video.google.co.uk/videoplay?docid=-6292681755101931445

Google Video
Film title - BEE MOVIE
Name of clip – BEE MOVIE - COMING DECEMBER 2007
Name of account – wez@waytoblue.com
Date of upload – 13/03/2007
URL - http://video.google.co.uk/videoplay?docid=-1525295584835566336&hl=en-GB

You Tube
Film title - BEE MOVIE
Name of clip – BEE MOVIE - COMING DECEMBER 2007
Name of account – markblu22
Date of upload – 13/03/2007

URL - http://www.youtube.com/watch?v=zZXtQmYe4iY